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# ***OAR Box 1824***

*Prepped by Charmelle Mathews*

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A-90-16

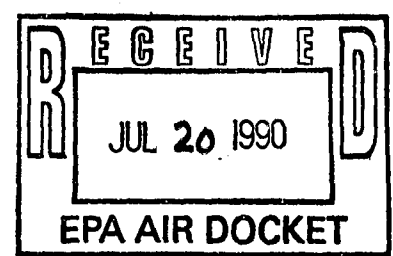
A-90-16  
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Document Control Officer  
U.S. Environmental Protection Agency  
Air Docket Room (LE-131)  
401 M St., S.W.  
Washington, D.C. 20460

Dear Sir or Madam:

Re: Docket No. A-90-16  
Notice of Fuels and Fuel Additives;  
Waiver Application

Enclosed on behalf of Nissan Motor Company, Ltd, are Nissan's brief comments regarding Ethyl Corporation's Fuels and Fuel Additives Waiver Application for the gasoline additive methylcyclopentadienyl manganese tricarbonyl (MMT) to be labeled commercially as HITEC 3000.

At this time, Nissan does not have any emission durability data using the MMT concentration level proposed to be used in HITEC 3000. However, we have confirmed, by using a higher concentration of MMT than is proposed to be used by Ethyl, the adverse impact of MMT on the longevity of catalysts. This conclusion is consistent with the general consensus.

Because our studies have shown that MMT causes damage to the catalysts by accumulating over time, Nissan believes that any concentration level of MMT would cause irreparable damage to a catalyst and should not be used.

In addition, the current trend of emission standards indicates more stringent standards will be implemented. Emission control will become a highly difficult and sensitive issue and a gasoline additive, such as MMT, which has the potential to damage the catalyst should not be allowed.

If you have any questions or need further information regarding our enclosed comments, please contact Mr. Noboru Fujii of my staff at (202)466-5284.

Respectfully submitted,

NISSAN RESEARCH & DEVELOPMENT, INC.



Satoshi Nishibori

Vice President

Industry/Government Affairs

Enclosure

cc) Ms. Mary T. Smith